

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Telecommunications Relay Services)
and Speech-to-Speech Services for)
Individuals with Hearing and Speech)
Disabilities)

CC Docket No. 98-67

REPLY COMMENTS OF GTE

GTE Service Corporation and its affiliated domestic telephone operating, wireless, and long distance companies¹ (collectively, "GTE") respectfully submit reply comments in response to the *Notice of Proposed Rulemaking* in the above-captioned proceeding.² In the *NPRM*, the Federal Communications Commission ("FCC" or "Commission") seeks comments regarding rule amendments designed to enhance the quality and use of Telecommunications Relay Service ("TRS").

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- ¹ These comments are filed on behalf of GTE's affiliated domestic telephone operating companies, GTE Wireless Incorporated, and GTE Communications Corporation, Long Distance Division. GTE's domestic telephone operating companies are: GTE Alaska Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., and Contel of the South, Inc.
- ² Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, *Notice of Proposed Rulemaking*, CC Docket No. 98-67, FCC 98-90 (released May 20, 1998) (hereinafter "*NPRM*").

I. INTRODUCTION AND SUMMARY

On July 20, 1998, GTE filed comments generally supporting the Commission's efforts in this proceeding. In particular, GTE supported the Commission's proposal to expand TRS to include STS relay services, but opposed amendments to the minimum standards or enforcement rules. In these reply comments, GTE addresses two issues not addressed in the initial comment round. First, regarding the handling of emergency calls, GTE believes that TRS centers should only be required to pass ANI if they are technically able to receive ANI. GTE opposes any attempt by the Commission to define "emergency calls." Second, GTE supports CTIA's request that the Commission examine whether enhanced protocols such as v.18 will improve interconnectivity between TTYs and digital wireless handsets.

II. DISCUSSION

A. Proposed modifications to emergency call procedures are not needed.

In the *NPRM*, the Commission notes that its current TRS regulations require that "CAs shall handle emergency calls in the same manner as they handle any other TRS calls."³ The Commission, therefore, seeks comment regarding (1) whether TRS centers should be required to pass a caller's automatic number identification ("ANI") to an emergency services operator; and (2) how "emergency calls" should be defined.⁴

³ *NPRM*, at 18 (¶ 40), *citing* 47 C.F.R. § 64.604(a)(3).

⁴ *Id.*, at 19 (¶ 41).

GTE notes that several commenters expressed concerns that TRS centers may not be equipped to receive and pass ANI to emergency services operators. Bell Atlantic, for example, stated that not all TRS centers are equipped to receive ANI.⁵ Likewise, several parties stated opposition to automatically passing this information because of technical considerations and cost.⁶

Like these parties, GTE believes that technical considerations may prevent TRS centers from receiving and passing ANI to emergency services operators. GTE therefore urges the Commission to rule that ANI should be passed forward to the emergency call center only if the call center is capable of receiving ANI.

Regarding the definition of "emergency calls," GTE does not believe the Commission should attempt to define the term. In their comments, several parties stated that defining "emergency calls" is not necessary.⁷ The Kansas Relay Service, for example, stated that its policy is that "[i]f the caller says "emergency", the call is deemed an emergency and no further questions are asked."⁸ Similarly, SBC commented that "the assessment as to whether there is an emergency should be the

⁵ Bell Atlantic Comments at 5.

⁶ Kansas Relay Service Comments at 6; MCI Comments at 5; SBC Comments at 8.

⁷ See, e.g., Bell Atlantic Comments at 5; SBC Comments at 8; Kansas Relay Service Comments at 6.

⁸ Kansas Relay Service Comments at 6.

caller's own. The CA should not be placed in the untenable position of making this determination."⁹

GTE agrees that neither the TRS center nor its employee CAs should determine whether a call placed through a TRS center is an "emergency call." Given that the FCC requires all emergency calls to be handled in the "same manner as any other TRS call," distinguishing such calls from other TRS calls is entirely unnecessary. Indeed, any attempt by a TRS center to label emergency calls as such would only serve to increase the likelihood that emergency calls are treated different than other TRS calls.

B. The Commission should consider the capability of enhanced TTY protocols.

In the *NPRM*, the Commission declined an invitation by a number of commenters, especially the Cellular Telecommunications Industry Association ("CTIA"), to promote the integration of enhanced TTY transmission protocols, such as the v.18 protocol, into the TTY network.¹⁰ In its comments, the CTIA stated that it disagrees with the Commission's reluctance, "particularly when evidence indicates that such protocols have the very real potential not only to improve interconnectivity between TTYs and digital wireless handsets but also to improve TRS calls."¹¹ CTIA stated, further, that groups such as the Wireless TTY Forum – a group including representatives from the four interest groups that have a significant stake in providing TTY users access to 911

⁹ SBC Comments at 8.

¹⁰ *NPRM*, at 35 (¶ 79).

¹¹ CTIA Comments at 2.

over digital wireless systems, the International Telecommunications Union ("ITU"), and Gallaudet University are in various phases of studying and/or testing the v.18 protocol and that, to date, the results have been positive.¹²

CTIA argues that the Commission is obligated under the Americans with Disabilities Act to ensure that persons with hearing and speech disabilities benefit from technological advances.¹³ Accordingly, CTIA asks that the Commission's Office of Engineering and Technology become actively involved in reviewing the data and stating an opinion on the technical feasibility of enhanced protocols, such as v.18, that may improve TRS calls and TTY interconnectivity with digital services.¹⁴

GTE agrees with CTIA that the Commission should state an opinion on the merits of v.18 and other enhanced protocols for TTY interconnectivity with digital services. GTE therefore joins CTIA in urging the FCC's Office of Engineering and Technology to review these enhanced protocols and determine if they have merit in improving the accessibility of TRS communications.

¹² *Id.*, at 3-6.

¹³ *Id.*, at 5, *citing* 47 U.S.C. § 225(d)(2); H.R. Rep. No. 101-485(II), 101st Cong., 2d Sess. 130 (1990).

¹⁴ *Id.*, at 6.

III. CONCLUSION

As noted herein and in its initial comments, GTE supports the Commission's effort to improve TRS for individuals with hearing and speech disabilities. GTE believes that ANI should only be passed from TRS centers to emergency operators if the TRS center is capable of receiving ANI. GTE does not believe that the Commission should define "emergency calls." GTE further believes that the Commission should examine new protocols such as V.18 and their ability to improve TRS communications.

Dated: September 14, 1998

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating companies

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Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on September 14, 1998 to all parties of record.



Judy R. Quinlan